



NEWMAN LAW OFFICES

www.newmanlawoffices.com

Washington, DC Office
1717 K STREET, NW, SUITE 900
WASHINGTON, DC 20006
(202) 544-8040

Portland, Oregon Office
1050 SW 6TH AVENUE, SUITE 1100
PORTLAND, OREGON 97204
(503) 535-8040

Facsimile: (866) 544-8040

Howard A. Newman, Esq.*
howard@newmanlawoffices.com

*Licensed in OR, DC, MD and FL

January 17, 2025

VIA ECF

Hon. P. Kevin Castel
U.S. District Court for the Southern District of New York
500 Pearl Street; Courtroom 11D
New York, New York 10007-1312
(212) 805-0262
Castel@NYSDCambers@nysd.uscourts.gov

RE: **Multi-State Partnership for Prevention, LLC v. Deloitte Consulting, LLP, et al.**
Case No. 1:24-cv-09013-PKC (S.D.N.Y.)
Motion to Adjourn February 3, 2025, Conference

Dear Judge Castel:

I represent Multi-State Partnership for Prevention, LLC ("**MSPP**") in the above referenced matter. MSPP requests that this Court adjourn the Initial Pretrial Conference set for February 3, 2025 ("**IPC**") with Defendant, Deloitte Consulting, LLP ("**Deloitte**"). In support of this request, I provide the following background.

On November 25, 2024, MSPP commenced the instant action. On December 3, 2024, this Court, *sua sponte*, issued an order, *inter alia*, permitting MSPP to submit a single special interrogatory onto Deloitte concerning pleading diversity. **DKT. NO. 6 ("Court's Order")**. If MSPP did so, according to this Court's Order, MSPP would be required to file an amended complaint by January 17, 2025. *Id.* On January 6, 2025, Deloitte responded to said special interrogatory. Moments ago, MSPP timely filed an amended complaint (adding multiple causes of action). **DKT. NO. 14.**

MSPP has concluded that it is premature to have the IPC as scheduled. Notably, as MSPP had forecasted, MSPP had not and has not yet served Deloitte, formally or otherwise. **DKT. NO. 12.** In agreeing to personal jurisdiction, Deloitte waived formal service. As such, pursuant to rule, Deloitte would be entitled to an additional amount of time in which to respond to a sixty-two (62) page pleading. Accordingly, it seems prudent at this time for the Court to adjourn the IPC until the Parties have had sufficient time to confer. Thereafter, the Parties may jointly communicate with this Court concerning the IPC. Therefore, as consistent with instructions from chambers, MSPP submits this letter motion and requests that this Court issue an appropriate order.

///

Conference adjourn
from Feb 3,
2025 to
April 7, 2025 at 10:30 AM.
SO ORDERED
[Signature]
USDC
1-21-25

Hon. P. Kevin Castel

Multi-State Partnership for Prevention, LLC v. Deloitte Consulting, LLP, et al.

Case No. 1:24-cv-09013-PKC

January 17, 2025

Very truly yours,

/s Howard A. Newman/

Howard A. Newman